

**LATHAM & WATKINS** LLP

April 24, 2006

**VIA FACSIMILE**

Thomas M. Kennedy  
Kennedy, Jennik & Murray, P.C.  
113 University Place, 7<sup>th</sup> Floor  
New York, NY 10003

Bruce H. Simon  
Cohen, Weiss and Simon LLP  
330 West 42nd Street  
New York, NY 10036

Babette A. Ceccotti  
Cohen, Weiss and Simon LLP  
330 West 42nd Street  
New York, NY 10036

Tom Jerman  
O'Melveny & Myers LLP  
1625 Eye Street, N.W.  
Washington, DC 20006-4001

Re: Discovery Relating To Section 1113 and 1114 Motion

Dear Mr. Kennedy, Mr. Simon, Ms. Ceccotti, Mr. Jerman:

The Official Committee of Unsecured Creditors (the "Committee") intends to be involved in the discovery process relating to the Motion for Order Under 11 U.S.C. § 1113(c) Authorizing Rejection of Collective Bargaining Agreements and Under 11 U.S.C. § 1114(g) Authorizing Modification of Retiree Welfare Benefits (the "Motion") filed by Delphi Corporation and its affiliated debtors (collectively, the "Debtors").

The Committee is currently aware of the following depositions that have been scheduled. Please notify the Committee immediately of any changes or additions to the schedule set forth below.

53rd at Third  
885 Third Avenue  
New York, New York 10022-4834  
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File No. 042036-0001

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**IUE-CWA WITNESSES:**

Date & Time	Deponent	Location	Party Taking Deposition
April 26 at 8:30 a.m.	Keith Bailey	Troy (Somerset Inn)	Debtors
April 26 at 12:30 p.m.	Donald Abrogast	Troy (Somerset Inn)	Debtors
April 26 at 3:30 p.m.	Frank Allen	Troy (Somerset Inn)	Debtors
April 27 at 8:30 a.m.	Rochone Ruffin	Troy (Somerset Inn)	Debtors
April 27 at 12:30 p.m.	Brian Gilson	Troy (Somerset Inn)	Debtors
April 27 at 3:30 p.m.	Henry Newman	Troy (Somerset Inn)	Debtors
April 28 at 8:30 a.m.	Henry Reichard	Troy (Somerset Inn)	Debtors
April 28 at 12:30 p.m.	Michael Palmer	Troy (Somerset Inn)	Debtors
April 28 at 3:30 p.m.	Ted Williams	Troy (Somerset Inn)	Debtors

**UAW WITNESSES:**

Date & Time	Deponent	Location	Party Taking Deposition
April 28 at 9:00 a.m.	Richard Ruppert	Troy	Debtors
May 1 at 9:00 a.m.	Andrew Yearley	New York	Debtors

**IBEW WITNESSES:**

Date & Time	Deponent	Location	Party Taking Deposition
April 27 at 2:30 p.m.	Randal Middleton	Milwaukee	Debtors

**DELPHI WITNESSES:**

Date & Time	Deponent	Location	Party Taking Deposition
April 27 at 9:00 a.m.	Kevin Butler	Troy (Somerset Inn)	IUE-CWA
April 27 at 1:00 p.m.	Bernard Quick	Troy (Somerset Inn)	IUE-CWA

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IUOE WITNESSES:

Date & Time	Deponent	Location	Party Taking Deposition
April 27 at 10:00 a.m.	Charles Scherer	Troy	Debtors
April 27 at 2:00 p.m.	Jim Glathar	Troy	Debtors

Very truly yours,

*Mitchell Seider /ER*

Mitchell Seider  
of LATHAM & WATKINS LLP

cc: John Wm. Butler Jr.  
David Springer